

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

SYMBOLOGY INNOVATIONS, LLC

Plaintiff,

v.

VALVE CORPORATION,
GEARBOX SOFTWARE, LLC
Defendant.

Civil Action No. 2:23-cv-419-JRG-RSP

JURY TRIAL DEMANDED

**DECLARATION OF SCOTT LYNCH IN SUPPORT
OF VALVE CORPORATION'S OPPOSITION TO DEFENDANTS' MOTION TO
TRANSFER**

1. My name is Scott Lynch. I am over the age of twenty-one years, of sound mind, and competent in all respects to make this declaration.

2. I make this declaration based on my own knowledge and investigation within Valve Corporation ("Valve") as to the matters reflected within this declaration. I could and would competently testify to the accuracy of this declaration if called upon to testify regarding its contents.

3. I am the Chief Operating Officer at Valve. I have been employed by Valve since 2000.

4. I have been a resident of Washington state my entire tenure as a Valve employee.

5. Since its founding in 1997, Valve has been incorporated in the state of Washington. Valve's headquarters is located at 10400 Northeast Fourth St., Suite 1400, Bellevue, WA 98004.

6. Valve has more than 300 employees, the overwhelming majority of whom reside in Washington state.

7. Valve does not have any employees in Texas.

8. Valve's corporate servers and document storage systems are in Washington state.

9. As part of my duties with Valve, I executed the 2016 Global Settlement and License Agreement on behalf of Valve to resolve litigation between Valve and Display Technologies, LLC.

10. I negotiated and executed the 2016 Global Settlement and License Agreement from Washington state.

11. I was assisted in negotiating the 2016 Global Settlement and License Agreement by Karl Quackenbush, a former Valve employee who lived in Washington state at the relevant time.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on November 13, 2023

DocuSigned by:

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Scott Lynch